

DN FST CV 15 6048103-S

DONNA L. SOTO, ADMINISTRATRIX)	SUPERIOR COURT
OF THE ESTATE OF VICTORIA L.)	
SOTO, DECEASED, ET AL.)	J.D. OF FAIRFIELD/BRIDGEPORT
)	@ BRIDGEPORT
v.)	
)	
BUSHMASTER FIREARMS)	
INTERNATIONAL, LLC, ET AL.)	OCTOBER <u>26</u> , 2015

APPLICATION FOR PERMISSION TO APPEAR *PRO HAC VICE*

Pursuant to Practice Book §2-16, the undersigned counsel, a member in good standing of the Bar of the State of Connecticut, respectfully presents *James B. Vogts*, a member in good standing of the Bar of the Supreme Court of Illinois, the United States Supreme Court, the United States Courts of Appeals for the First, Second, Fifth, Seventh, Ninth, Tenth, and District of Columbia Circuits, and the United States District Courts for the Northern District of Illinois, Eastern District of Wisconsin, and District of Colorado, for admission *pro hac vice* in connection with the above captioned matter on behalf of the Defendants, *Remington Arms Co., LLC* and *Remington Outdoor Company, Inc.* Attorney Vogts is a member of the law firm of Swanson, Martin & Bell, LLP, having the following contact information: Swanson, Martin & Bell, LLP, 330 North Walbash, Suite 3300, Chicago, Illinois 60611, telephone number (312) 321-9100, facsimile number (312) 321-0990, email: jvogts@smbtrials.com.

Based on the Affidavit of *James B. Vogts* submitted herewith, good cause exists for granting this Application in that Attorney Vogts has a long-standing attorney-client relationship with said Defendants, and he was previously admitted as counsel for said Defendants *pro hac*

vice in the United States District Court for the Judicial District of Connecticut in this same action, which has now been remanded to this Court. Attorney Vogts' relationship with said clients and his knowledge of the subject matter of the action is critical to the defense of this action. As required by Practice Book §2-16, Attorney Vogt's Affidavit is submitted herewith and it is attached hereto as Exhibit A. Also included in Exhibit A is a certification concerning Attorney Vogt's payment of the client security fund fee.

An attorney from the law firm of Diserio Martin O'Connor & Castiglioni, LLP, a member of the bar of the State of Connecticut, will be present at all proceedings, will file all papers, briefs and other papers filed with this court, and will assume full responsibility for them and for the conduct of the cause and for the attorney who is accorded the privilege of appearing *pro hac vice*.

WHEREFORE, it is respectfully requested that this Application be granted.

THE DEFENDANTS,

REMINGTON ARMS CO., LLC and
REMINGTON OUTDOOR COMPANY, INC.

BY: /s/ Scott M. Harrington/#307196
Scott M. Harrington
DISERIO MARTIN O'CONNOR &
CASTIGLIONI LLP #102036
One Atlantic Street
Stamford, CT 06901
(203) 358-0800
sharrington@dmoc.com

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was mailed on October 26, 2015, to the following counsel of record:

Koskoff Koskoff & Bieder, PC
350 Fairfield Avenue
Bridgeport, CT 06604
jkoskoff@koskoff.com

Renzulli Law Firm LLP
81 Main Street, Suite 508
White Plains, NY 10601

/s/ Scott M. Harrington, #307196
Scott M. Harrington

DN FST CV 15 6048103-S

DONNA L. SOTO, ADMINISTRATRIX)	SUPERIOR COURT
OF THE ESTATE OF VICTORIA L.)	
SOTO, DECEASED, ET AL.)	J.D. OF FAIRFIELD/BRIDGEPORT
)	@ BRIDGEPORT
v.)	
)	
BUSHMASTER FIREARMS)	
INTERNATIONAL, LLC, ET AL.)	OCTOBER 20, 2015

AFFIDAVIT OF JAMES B. VOGTS

1. I am over eighteen (18) years of age, and I understand the duty and obligations of an oath.
2. I make this Affidavit for the purposes of being admitted *pro hac vice* to appear before the Superior Court of the State of Connecticut on behalf of the Defendants, Remington Arms Co., LLC and Remington Outdoor Company, Inc., in connection with the above captioned matter.
3. I am an attorney at law, admitted to practice and in good standing of the bar of Supreme Court of Illinois, as well as the United States Supreme Court, the United States Courts of Appeals for the First, Second, Fifth, Seventh, Ninth, Tenth and District of Columbia Circuits, and the United States District Courts for the Northern District of Illinois, Eastern District of Wisconsin, and District of Colorado.
4. I certify that there is no grievance pending against me in any jurisdiction, and that I have never been reprimanded, suspended, placed on inactive status, disbarred or otherwise disciplined for, and never resigned from, the practice of law.

5. I have paid the Client Security Fund fee due for the calendar year of 2015, the calendar year in which this application is made.


6. I designate the Chief Clerk of the Superior Court for the Judicial District of Fairfield at Bridgeport as my agent upon whom process and service of notice may be served.

7. I agree to register with the Statewide Grievance Committee in accordance with Connecticut Practice Book §2-16 while appearing in this matter and for two years after its completion, and to notify the Statewide Grievance Committee of the expiration of the two-year period.

8. I have appeared *pro hac vice* in the Superior Court of the State of Connecticut in one other cases since I first appeared *pro hac vice* in Connecticut: *Ganim v. Smith & Wesson Corp.*, Judicial District of Waterbury, X06 CV9901531985.

9. I have a long-standing attorney-client relationship with said Defendants, and was previously admitted as counsel for said Defendants *pro hac vice* in the United States District Court for the Judicial District of Connecticut in this same action, which has now been remanded to this Court.

10. I solemnly affirm under the penalties of perjury that the contents of the foregoing affidavit are true and correct based upon my personal knowledge and belief.



James B. Vogts

Subscribed and sworn to before me,
the undersigned officer, this 20th day
of October, 2015.

Pamela Canington
Notary Public
My Commission Expires: _____

